

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA,)	CASE NO. 1:12 CR 174
)	
Plaintiff,)	JUDGE DONALD NUGENT
)	
v.)	
)	<u>UNOPPOSED MOTION TO</u>
ADAM S. URBAN,)	<u>CONTINUE TRIAL</u>
)	
Defendant.)	

Defendant Adam Urban hereby moves to continue the trial currently set for December 11, 2012. The government does not oppose this request.

The Court has authority to continue the trial and good cause exists to do so. Mr. Urban has recently retained new counsel, who requires additional time to review the evidence, obtain discovery and prepare for trial. Much of the evidence in this case is highly technical and may require expert assistance to analyze and present. The statute under which Mr. Urban has been charged – the Digital Millennium Copyright Act – is relatively new, complicated, has seldom been charged criminally, and has been subject to conflicting legal interpretations. (A motion to dismiss charges brought under this statute is pending before the Court in another case.)

To prepare to meet the charges against Mr. Urban, counsel requests, and justice requires, that the trial be delayed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of the foregoing *Unopposed Motion to Continue Trial* was filed electronically this 9th day of November, 2012. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Philip S. Kushner
Attorney for Adam Urban